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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

HILLCREST INVESTMENTS, LTD., a  
Canadian Corporation; AMERGOSA  
ENTERPRISE, LLC.,

Plaintiffs,

vs.

AMERICAN BORATE COMPANY, a foreign  
corporation; AMERICAN BORATE  
COMPANY of Texas, a foreign corporation;  
STATE ENGINEER, STATE OF NEVADA;  
DEPARTMENT OF CONSERVATION AND  
NATURAL RESOURCES, DIVISION OF  
WATER RESOURCES, a Nevada Political  
Subdivision; RAMM CORPORATION, a  
Nevada Corporation; UNITED STATES FISH  
AND WILD SERVICE, a division of the  
UNITED STATES; NATIONAL PARK  
SERVICE, a division of the UNITED  
STATES; DOES I – V; and ROES VI – X,

Defendants.

Case No. 2:21-cv-00964-RFB-NJK

**STIPULATION AND ORDER TO EXTEND  
DEADLINE TO FILE RESPONSE TO  
DEFENDANTS' AMERICAN BORATE  
COMPANY AND AMERICAN BORATE  
COMPANY OF TEXAS' RENEWED  
MOTION FOR SANCTIONS**

**(SIXTH REQUEST)**

Plaintiffs, HILLCREST INVESTMENTS, LTD., and AMERGOSA ENTERPRISE, LLC<sup>1</sup>  
("Plaintiffs"), Defendants, AMERICAN BORATE COMPANY AND AMERICAN BORATE  
COMPANY OF TEXAS (collectively "American Borate") and non-party attorney BYRON  
THOMAS, ESQ., ("Thomas") hereby stipulate and agree as follows:

On June 28, 2022, American Borate filed a renewed motion for sanctions against Plaintiffs  
and Thomas. Based on the filing of a previous stipulation, Plaintiffs' and Thomas' response is due  
September 2, 2022. However, Plaintiff, Hillcrest Investments, Ltd. has recently retained new  
counsel, Karen L. Hanks of Hanks Law Group, and Ms. Hanks has communicated with American

<sup>1</sup> The proper name is Amargosa Enterprises, LLC.

Borate's counsel regarding a potential resolution of the renewed motion for sanctions. However, to allow time to issue an offer and negotiate a resolution, the parties agree to extend both Plaintiffs' and Thomas' response deadline to September 23, 2022.

The parties do not seek this extension to cause delay or prejudice any party.

Dated this 2<sup>nd</sup> day of September, 2022.

<p><b>HANKS LAW GROUP</b></p> <p><i>/s/ Karen L. Hanks</i>  Karen L. Hanks, Esq.  Nevada Bar No. 9578  7625 Dean Martin Drive, Ste 110  Las Vegas, Nevada 89139  Attorneys for Hillcrest Investments, Ltd.</p>	<p><b>LEONARD LAW, PC</b></p> <p><i>/s/ Debbie Leonard</i>  Debbie Leonard, Esq.  Nevada Bar No. 8260  955 South Virginia Street, Ste 220  Reno, Nevada 89502  Attorney for American Borate Company and  American Borate Company of Texas</p>
<p><b>LAW OFFICES OF BYRON THOMAS</b></p> <p><i>/s/ Byron Thomas</i>  Byron Thomas, Esq.  Nevada Bar No. 8906  3275 S. Jones Blvd. Ste 104  Las Vegas, Nevada 89146  As Non-Party and Attorney for Amergosa  Enterprise, LLC</p>	

IT IS SO ORDERED.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 6th day of September, 2022.